

SCRUTINY COMMENTS ON EXAMINATION OF MODIFIED MINING PLAN AND PROGRESSIVE MINE CLOSURE PLAN OF GHATKURI IRON ORE MINE OF M/S NIRMAL KUMAR PRADEEP KUMAR, OVER AN EXTENT OF 149.7343 HECTARES, FALLS IN KARAMPADA & GHATKURI RESERVED FOREST OF SINGHBHUM WEST DISTRICT OF JHARKHAND STATE, SUBMITTED UNDER RULE 17(3) OF MCR, 2016.

(1) In the front cover, it is found that, the document has been submitted under Rule 17(3) of MCR, 2016 for modification in the approved mining plan, which is not required as the mining plan approved in the last occasion has already lapsed, thereby instead of submitting modification in the approved mining plan, the **Review of Mining Plan**, under Rule 17(2) of MCR, 2016 should be submitted. Accordingly, corresponding changes may also be made in other places of the document. Besides, the period of modification has been indicated to be for the period from 28.07.2013 to 31.03.2018, instead the document should have submitted for the block period 2013-14 to 2017-18 along with the proposed plan period only for the year 2017-18.

(2) (i) In the consent letter / undertakings /certificate from the applicant, the consent is stated to be given for modification in mining plan, instead the consent should be given for preparation of Review of Mining Plan, under Rule 17(2) of MCR, 2016.

(3) The document has been submitted in three volumes, one for the text, one for the annexure and the third one for Drawings, instead the entire document should be maximum of two volumes for ease in handling.

(4) The contents for annexure has not been furnished in the text volume and the same for drawings has been attached at the end of the text, which is not proper, instead the contents for the all relevant attachment should be furnished at the beginning of the text for ease in monitoring.

(5) (i) In the consent letter from the applicant, Shri Pradeep Kumar Jain, M/s Nirmal Kumar Pradeep Kumar has been consented to Dr. Gurupinder Singh Jaiswal, Qualified person for preparation of modification in approved mining plan but the ID proof in support of Dr. G.S. Jaiswal has not been submitted. (ii) When Shri Nirmal Kumar Jain and Pradeep Kumar Jain are partners in M/s Nirmal Kumar Pradeep Kumar why Shri Pradeep Kumar Jain alone has been signed the consent letter/certificate /declaration /undertaking alone should be discussed. Besides, the ID & address proof only in support of Shri Pradeep Kumar Jain has been enclosed as annexure-VII but the same for Shri Nirmal Kumar Jain is missing.

(6) The chemical analysis report of iron ore samples from SGS has been enclosed as annexure-XI but the report is very old analysed on 15.11.2012, which is not acceptable, thereby a fresh report to that effect should be submitted. Besides, a valid NABL accreditation certificate issued in favour of SGS may also be enclosed.

(7) The copy of the CTO enclosed as annexure-XVIII has already lapse on 30.09.2013; thereby a valid consent to operate from Jharkhand State Pollution Control Board should be submitted.

(8) The ambient air quality analysis, noise level study & water analysis report enclosed as annexure-XXI are found to be very old, analysed during 24.09.2009 & 29.09.2009, which is not acceptable, instead, the same should be replaced by a fresh reports either from a NABL accredited laboratory or from a Govt. Laboratory. Besides, a valid NABL accreditation certificate issued in favour of the analytical laboratory may also be submitted.

(9) The copy of the Bank guarantee enclosed as annexure-XXIV has already lapsed on 31.03.2014, thereby a fresh Bank Guarantee matching to the plan period should be submitted as per the requirement of Rule 27(1) of MCDR, 2017 replacing the enclosed one for clarity.

(10) The copy of the explosive procurement license issued to M/s Nirmal Kumar Pradeep Kumar has been enclosed as annexure-XXV but the said license has already expired on 31.03.2016. Besides, an agreement has been made between M/s Nirmal Kumar Pradeep Kumar (1st party) and M/s D.K. Ghosh (2nd party) for carrying out blasting operations in the Ghatkuri iron ore mine but explosive license issued to the 2nd party M/s D.K. Ghosh has already lapsed on 31.03.2015 & moreover the copy of the explosive license issued to the 2nd party also not enclosed. Therefore, a valid explosive procurement license issued either in favour of 1st party or in favour of the 2nd party should be submitted. Besides, a copy of the blasters license issued by the competent authority may also be submitted.

(11) The lease extension letter enclosed as annexure-XXVI is not pertained to Ghatkuri Iron ore mine of M/s Nirmal Kumar Pradeep Kumar, thereby not acceptable. Therefore, a copy of the lease extension letter pertaining the above referred mine issued by the competent authority should be submitted replacing the enclosed one for clarity.

(12) Few photographs showing the status of existing quarries, afforestation has been enclosed as annexure-XXXII but no photographs in support of existing status dump(s) and boundary pillars has been enclosed and the same may be submitted.

(13) The DGPS surveyed map/report has not been submitted along with the document in compliance to CCOMs circular No.2/2010, which should be submitted.

(14) In case of individual or partner, a declaration/affidavit should be submitted to know whether he is working in other firms/company/organization etc.

(15) Under the heading **Bench Parameters**, it is mentioned that, the proposed height of the benches will be restricted to 6m and the width is more than the height, instead the average width of the benches should be specified. Specific information for bench formation both in overburden & in ore zone should be furnished. Besides, it is found that, a reference for the lapse year 2016-17 has been given, which is uncalled for and must be deleted not only from this page but at all other places in the document. (Page No. 2-ii)

(16) Under the heading **proposed production**, it is mentioned that, the period 28.07.2013 to 31.03.2017 is about to expire, whereas the said period has already expired, thereby the proposal only for the year 2017-18 should be furnished. Besides, the achievements on account of production for the lapse period 2013-14 to 2016-17 may also be furnished in tabular form. Accordingly, necessary corrections /modifications may also be made at other relevant places of the document. (Page No. 2-ii & 2-iii).

Para 2.1(C)- Reasons for non-operation of the mine should be explained.

(17) Under the heading **5th Year Development (2017-18)**, it is found that, during the year 2017-18, the excavation planning has been proposed in zone-A, zone-B & zone-C. On examination, it is found that, there 4 nos. of pits in zone-A, 3 nos. of pits in zone-B & 4 nos. of pits in zone-C are proposed to be excavated during the said year but the reasons for proposing so many pits should be justified with valid reasons. Besides, it is also found that, some small pits are proposed for merger but no specific proposal for the same has been given. Accordingly, corresponding changes may also be made at other connected places in the text as well as in the relevant plates submitted along with the document. (Page No. 2-v)

(18) On examination of the tables furnished in the pages under reference, it is found that, the entire excavated materials are considered as ROM, it seems, there is no lateral extension of the pits in the overburden zone and no barren patches in the benches proposed under excavation planning, which cannot be a regular phenomena. Therefore, the bench formation status both in overburden and in ore zone should be clearly indicated. If there is any proposal for overburden handling, the status for the same may also be furnished in the calculation tables. Accordingly, corresponding incorporations/modifications may also be made in other relevant paras in the text of the document.(Page No.2-vi & 2-vii)

(19) The proposed excavated dimensions of the zones A,B & C has been in tabular form but it is suspected that, the pits in each zone are proposed to be merged with one another, if so the same may be clearly indicated in the table given in the page under reference for more informative. (2-xvi)

(20) The grades of waste, mineral reject & sub-grade has been furnished in the page under reference but the chemical analysis report neither from a NABL accredited laboratory nor from a Govt. Laboratory in support of the grades of the above materials has been enclosed, which should be submitted. (Page No. 2-xvi)

(21) Under the heading **Ultimate Extent and size of the pit**, it is found that, the ultimate pit limit before and after obtaining forest diversion proposal is missing, which should be furnished and the para may be revised accordingly. (Page No. 2-xvii)

(22) Under the heading **waste management**, it is mentioned that, 507607 m³ of waste materials are proposed to be backfilled from 6th year onwards but the present document has been submitted only for one year i.e. 2017-18, thereby the para may be revised accordingly. Besides, the name of the pit proposed to be reclaimed & location co-ordinates of the proposed backfilling may also be furnished for more informative. (Page No. 2-xviii)

(23) Under the heading **manpower**, a mention has been made about the 15 number of managers & supervisory personnel and 96 numbers of skilled & semi-skilled persons are deployed in the mine but the split up status for manpower such as Mine Manager, mining engineer, geologist as well as skilled, semi-skilled & un-skilled workforce should be clearly indicated for ease in monitoring. (Page No.2-xix)

(24) Under the heading **Reclamation of Dump**, a mention has been made that, there is no waste dump in the lease area, whereas in page No. 2-xvii, under the heading **ultimate capacity of the dump**, a mention has been made about four existing dumps in the lease area, thereby necessary corrections may be made in the document accordingly. (Page No.2-xxiii)

(25) Under the heading **Reclamation of other areas**, a mention has been made about the proposed reclamation status of the stack yard, road, site services and sub-grade stacks etc. But the location co-ordinates of such activities is missing, which should be furnished with proper plate reference. (Page No.2-xxiii)

(26) Zone wise/Pit wise extent of area proposed to be degraded during the year 2017-18 should be furnished. All should be furnished in tabular form and rest of the things should be erased. (Para 8.3.1) Instead of several quarries, proposal for a consolidated pit should be made to facilitate systematic mining and ease of mechanisation. Accordingly, corresponding changes may be made in the text as well as in the relevant plates submitted along with the document.

(27) The names & contact number of the person responsible during the emergency should be furnished. Besides, nearest fire stations, hospitals and police station is required to be mentioned for more informative. (Para 8.4)

(28) All the plan & sections submitted along with the modification document/review of mining plan should be certified by the qualified person mentioning that, the plans and sections are prepared based on the lease map authenticated by the State Govt. of Jharkhand.

(29) Plate. No.1 (Key Plan): The details of the deficiencies found on the plate are as follows: (i) Direction of flow of River/nala is missing on the plan portion of the plate as well as index reference for the same is also missing. (ii) The monitoring stations for air, noise & water has been marked within the 500m radius of the lease area including the lease area, instead, the aforesaid stations marked beyond the lease area should be erased for clarity.

(30) Plate-2: As per the contents for the list of drawings, a plate submitted in the name of lease plan duly signed by the DFO, Saranda division is considered as the lease plan (Authenticated), which is not correct. Moreover, another plate signed by the Deputy Commissioner, Chaibasa can be considered as authenticated lease map but the plate has not been numbered for its identification. Besides, a separate plate for lease may also be submitted.

(31) Plate No. 3 (Surface Plan): The boundary pillars are considered as Ground Control Points (GCP), which is not proper, instead at least three permanent ground control points outside the lease area should be selected and latitude & longitude of those points may also be furnished. Besides, these ground control points need to be linked with the boundary pillars. Accordingly, the location of GCP depicted in the other plates & in text may also be revised.

(32) Plate No. 13 (Environment Plan): All the existing features available within 500m radius of the lease area has not been marked, which should be depicted and the plate may be revised accordingly.

Geology and Exploration

(33) According to Rule 12(4) of MCDR, 2017 ***“In the case of existing mining leases detailed exploration (G1 level) over the entire potentially mineralized area under mining lease shall be carried out within a period of five years from the date of commencement of these rules”***; in such a case, the exploration proposals of the entire area in G1 level should be proposed accordingly.

(34) The entire area has been divided in three zones A,B &C, now in zone A,B&C in Resource estimation for the entire area-

a. In section line 2448100 the length of influence taken is on higher side which has to be recalculated for all the zones.

b. In zone A for section line 2448550 and 2448600 is not calculated for resource under 331 and 332category.

c. In zone B section line 2448600, the length of influence is taken on lower side for 331 and 332 category.

(35) The length of influence taken for Inferred Mineral Resource (333) for entire area in Section Line 2448100 and 2449700 is to be measured accordingly for resource estimation of entire area.

(36) In Pg.1-xxxiii, Resources, Reserve and Grade as per UNFC classification should be proposed as on certain date which is not mentioned and reserve shown in 121 category for the entire area and broken up area should be in 111 category. Necessary changes should be made in respective plans and sections accordingly.

(37) In Remaining Resources, Prefeasibility Mineral Resource under 221 and 222 category has been reported but Feasibility Study report has been attached as annexure XXIII, which contradicts each other.

(38) In Pg.1-xxxi under G 3 Prospecting, 3.38375 Million Tons of Resource has been reported but under summary of lease area explored G3 level of exploration has NIL area has been reported.

(39) Lithologs of the drilled BH should be attached as annexure for reference.
